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*Plaintiffs' Liaison Counsel*

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 16 UNITED STATES DISTRICT COURT  
 17 NORTHERN DISTRICT OF CALIFORNIA  
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19 IN RE: SOCIAL MEDIA ADOLESCENT  
 20 ADDICTION/PERSONAL INJURY  
 PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

21  
 22 This Document Relates to:  
 23 *M.L., on behalf of minor A.W. v. Meta*  
*Platforms, Inc., et al.*, 4:23-cv-03801

**DECLARATION OF JENNIE LEE  
 ANDERSON IN SUPPORT OF  
 PLAINTIFFS' ADMINISTRATIVE  
 MOTION TO FILE UNDER SEAL  
 EXHIBITS TO THE DECLARATION OF  
 JENNIE LEE ANDERSON IN SUPPORT  
 OF PLAINTIFFS' FIFTH EX PARTE  
 APPLICATION FOR APPOINTMENT  
 OF GUARDIANS AD LITEM**

24  
 25 *F.R. filed on behalf of B.R. v. Meta*  
*Platforms, Inc., et al.*, 4:23-cv-04102

26  
 27 *J.H filed on behalf of minor C.H. v. Meta*  
*Platforms, Inc., et al.*, 4:23-cv-03842

28 *A.H., filed on behalf of Minor A.R. v. Meta*

Platforms, Inc., et al., 4:23-cv-3798

*L.L. on behalf of A.L. v. Meta Platforms, Inc., et al.*, 4:23-cv-04262

*K.C and on behalf of K.C. v. Meta Platforms, Inc., et al., 4:23-cv-03179*

*S.M., individually and on behalf of N.M. v.  
Meta Platforms Inc., et al., 4:23-cv-03978*

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.

2. I make this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative Motion to Seal").

3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Fifth *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Declaration").

4. True and correct copies of the following Exhibits to the Anderson Declaration are as follows and attached hereto:

- *M.L., on behalf of minor A.W. v. Meta Platforms, Inc., et al.*, 4:23-cv-03801 (Exhibit 1)

- *F.R. filed on behalf of B.R. v. Meta Platforms, Inc., et al.*, 4:23-cv-04102  
(Exhibit 2)
  - *J.H filed on behalf of minor C.H. v. Meta Platforms, Inc., et al.*, 4:23-cv-03842  
(Exhibit 3)
  - *A.H., filed on behalf of Minor A.R. v. Meta Platforms, Inc., et al.*, 4:23-cv-3798  
(Exhibit 4)
  - *L.L. on behalf of A.L. v. Meta Platforms, Inc., et al.*, 4:23-cv-04262  
(Exhibit 5)
  - *K.C and on behalf of K.C. v. Meta Platforms, Inc., et al.*, 4:23-cv-03179  
(Exhibit 6)
  - *S.M., individually and on behalf of N.M. v. Meta Platforms Inc., et al.*, 4:23-cv-03978  
(Exhibit 7)

5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to, a standing stipulation that the individual applications seeking appointment of guardians ad litem in this case may be filed under seal. Liaison Counsel for Defendants also confirmed that, in so stipulating, Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause.

I declare under penalty of perjury pursuant to the laws of the United States of America that  
the foregoing is true and correct.

Dated: September 19, 2023

Respectfully submitted,

/s/Jennie Lee Anderson  
Jennie Lee Anderson  
Plaintiffs' Liaison Counsel

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